

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re OSG SECURITIES LITIGATION	:	Civil Action No. 1:12-cv-07948-SAS
_____	:	
	:	<u>CLASS ACTION</u>
This Document Relates To:	:	
	:	LEAD COUNSEL’S NOTICE OF MOTION
ALL ACTIONS.	:	AND MOTION FOR AN AWARD OF
_____	X	ATTORNEYS’ FEES AND EXPENSES AND
		REIMBURSEMENT OF LEAD
		PLAINTIFFS’ EXPENSES

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Robbins Geller Rudman & Dowd LLP, Court-appointed Lead Counsel and counsel for Stichting Pensioenfonds DSM Nederland, Indiana Treasurer of State, and Lloyd Crawford (“Lead Plaintiffs”), will move this Court on December 1, 2015, at 2:30 p.m., before the Honorable Shira A. Scheindlin, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. §77z-1(a)(4) and 15 U.S.C. §78u-4(a)(4) (“PSLRA”): (1) awarding attorneys’ fees; (2) paying litigation expenses incurred in prosecuting the Action; and (3) reimbursing Lead Plaintiffs for their reasonable costs and expenses (including lost wages) directly related to the representation of the Class, pursuant to the PSLRA. This motion is based on: (i) Lead Counsel’s Memorandum of Law in Support of Motion for an Award of Attorneys’ Fees and Expenses and Reimbursement of Lead Plaintiffs’ Expenses; (ii) the Declaration of David A. Rosenfeld in Support of Lead Plaintiffs’ Motion for Final Approval of Settlements and Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and Reimbursement of Lead Plaintiffs’ Expenses; (iii) the Declaration of Carole K.

Sylvester; (iv) the Declarations of Lead Plaintiffs; (v) the Declarations of Plaintiffs' Counsel; (vi) the Stipulations of Settlement; and (vii) all other proceedings herein.

A proposed order will be submitted with Lead Counsel's reply submission on or before November 24, 2015.

DATED: November 3, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
ROBERT R. HENSSLER JR.

s/ Ellen Gusikoff Stewart
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Lead Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2015, I caused the foregoing Lead Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Expenses and Reimbursement of Lead Plaintiffs' Expenses to be served electronically on all ECF participants.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART